

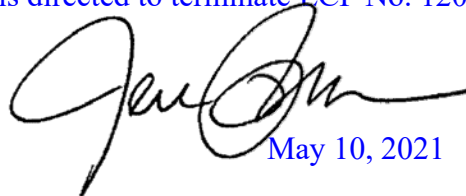
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May 7, 2021

VIA ECF

Hon. Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application GRANTED on a temporary basis. The Court will evaluate whether to maintain the redactions on a permanent basis when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 120. SO ORDERED.



May 10, 2021

Re: *Letter Motion to Request Permission to File Sealed Documents*
Willis et al. v. Herriott, No.21-cv-00487

Dear Judge Furman:

We represent defendant Paul Herriott in the above-referenced matter. We intend to e-file a supplemental memorandum of law in opposition to the motion for a preliminary injunction filed by Plaintiffs. We also intend to e-file a Declaration of Mark Sullivan ("Sullivan Declaration") in support thereof. Pursuant to the Court's Individual Rule 7, Defendant submits this letter in support of his application to seal Exhibits A through C to the Sullivan Declaration.

The parties agreed upon a confidentiality agreement in this case (the "Confidentiality Agreement") by which either party could designate material as confidential or highly confidential. See ECF No. 54. Pursuant to the Confidentiality Agreement, if either party seeks to file material so designated with the Court, it must seek to file such material under seal. *Id.*, ¶ 11.

Exhibits B and C to the Sullivan Declaration were produced by Plaintiffs and marked as, respectively, confidential and highly confidential. Thus, pursuant to the Confidentiality Agreement, Defendant seeks leave from the Court to file these documents under seal. Defendant also requests permission to file under seal Exhibit A, a document Defendant marked as confidential. Exhibits A and B are agreements entered between the parties that concern Defendant's personal financial information. See *Louis Vuitton Mallatier S.A. v. Sunny Merchandise Corp.*, 97 F.Supp.3d 485, 511 (S.D.N.Y. 2015 (information about individuals' personal finances filed under seal)). This agreement has been maintained as confidential in the ordinary course of business.

Respectfully submitted,

/s/ Mark S. Sullivan

Mark S. Sullivan